

Jeremy Lateiner (SBN 238472)
jlateiner@goodwinlaw.com
GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, CA 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Laura A. Stoll (SBN 238472)
lstoll@goodwinlaw.com
GOODWIN PROCTER LLP
601 S. Figueroa St. 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

David L. Permut (pro hac vice)
dpermut@goodwinlaw.com
GOODWIN PROCTER LLP
901 New York Ave, NW
Washington, D.C. 20001
Tel.: +1 202 346 4000
Fax.: +1 202 346 4444

Attorneys for WELLS FARGO & CO. and
WELLS FARGO BANK, N.A.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANGELO CLAMOR on behalf of himself and all others similarly situated,

Plaintiff,

WELLS FARGO & CO. and WELLS FARGO
BANK N A

Defendants.

Case No. 3:17-cv-03782-JD

STIPULATION AND [PROPOSED] ORDER STAYING CASE AND ALL DEADLINES PENDING SETTLEMENT

Courtroom: 11, 19th Floor
Judge: Hon. James Donato

1 Pursuant to Local Rules 6-1, 6-2, and 7-12, this Stipulation is entered into by and among
2 Defendants Wells Fargo & Co. and Wells Fargo Bank, N.A. (“Defendants”) and Plaintiff Angelo
3 Clamor (“Plaintiff,” and together with Defendants, the “Parties”), through their respective attorneys
4 of record.

5 WHEREAS, on September 6, 2017, Plaintiff filed a First Amended Complaint (ECF No.
6 21);

7 WHEREAS, pursuant to Fed. R. Civ. P. 15(a)(3), Defendants’ response to Plaintiff’s First
8 Amended Complaint is presently due on September 20, 2017;

9 WHEREAS, on August 3, 2017, the Court entered an Order (ECF No. 13) setting a Case
10 Management Conference for October 5, 2017 at 10:00 A.M.;

11 WHEREAS, on September 15, 2017, the Court entered an Order (ECF No. 24) setting an
12 ADR Phone Conference for September 25, 2017;

13 WHEREAS, the Parties have reached a settlement in principle that resolves all claims
14 asserted between them, and the Parties are working cooperatively to finalize an agreement that
15 memorializes the terms of their agreement within the next thirty (30) days;

16 WHEREAS, the Parties agree that this litigation and all deadlines should be stayed while
17 the Parties memorialize their agreement;

18

19

20

21

22

23

24

25

26

27

28

1 IT IS HEREBY STIPULATED AND AGREED THAT:

2 The above-captioned case and all deadlines, including the ADR Phone Conference and Case
3 Management Conference, shall be stayed in their entirety and extended by thirty (30) days.

5 **IT IS SO STIPULATED.**

6 Dated: September 20, 2017

7 By: /s/ David L. Permut
8 Jeremy Lateiner (SBN 238472)
9 *jlateiner@goodwinlaw.com*
10 **GOODWIN PROCTER LLP**
11 Three Embarcadero Center
San Francisco, CA 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

12 Laura A. Stoll (SBN 238472)
13 *lstoll@goodwinlaw.com*
14 **GOODWIN PROCTER LLP**
15 601 S. Figueroa St. 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

16 David L. Permut (pro hac vice)
17 *dpermut@goodwinlaw.com*
18 **GOODWIN PROCTER LLP**
19 901 New York Ave, NW
Washington, D.C. 20001
Tel.: +1 202 346 4000
Fax.: +1 202 346 4444

20 *Attorneys for WELLS FARGO & CO. and*
21 *WELLS FARGO BANK, N.A.*

22 By: /s/ Jeffrey Kaliel
23 JEFFREY KALIEL (CA 238293)
24 TYCKO & ZAVAREEI LLP
1828 L Street, NW, Suite 1000
Washington, DC 20036
Telephone: (202) 973-0900
Facsimile: (202) 973-0950
jkaliel@tzlegal.com

26 ANNICK M. PERSINGER (CA 272996)
27 TYCKO & ZAVAREEI LLP
483 Ninth St, Suite 200
Oakland, CA 94607
Telephone: (510) 254-6808

1 Facsimile: (202) 973-0950
2 apersinger@tzlegal.com

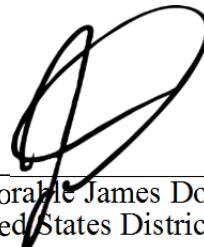
3 *Attorneys for Plaintiff*

4 **ORDER**

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

6 Dated: September 22, 2017

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Honorable James Donato
United States District Judge